

177394
39

5HE-12

OCT 30 1987.

Stephen W. Holt
Senior Environmental Engineer
NL Industries, Inc.
Environmental Control Department
P.O. Box 1090
Hightstown, NJ 08520

Dear Mr. Holt:

The purpose of this letter, which will provide written documentation of the results of the July 20, 1987 phone conversation between the United States Environmental Protection Agency (U.S. EPA), the Illinois Environmental Protection Agency (IEPA) and NL Industries, is twofold. First, U.S. EPA and IEPA hereby approve the revised RI/FS Work Plan Addendum transmitted to U.S. EPA and IEPA under your July 10, 1987 cover letter.

Second, U.S. EPA and IEPA hereby extend the schedule attached to U.S. EPA's June 16, 1987 letter to you by one week. This means that NL Industries shall submit the draft Remedial Investigation Report to U.S. EPA and IEPA on or before January 26, 1988.

The RI/FS Work Plan Addendum and the above-mentioned deadline for submission of the draft RI Report are hereby integral and enforceable elements of the RI/FS Consent Order, subject to the provisions for dispute resolution set forth therein. With the submission of the draft RI Report, the schedule beginning at subparagraph 14(b)(1) of the Consent Order will again govern the project.

If you have any questions concerning this letter, please contact me at (312) 886-4742.

Sincerely yours,

Brad Bradley, RPM
CERCLA Enforcement Section

cc: Ken Miller, IEPA

bcc: R. Diefenbach
N. Niedergang
J. Cooper, 5HE-12
R. Grimes, ORC

BB 10/29/87

5HE-12:CERCLA:IL/IN:BBRADLEY:1b:10/26/87:DISK #4



217/782-6761

177393

Refer to: L1190400007 -- Madison County
Granite City/Taracorp
Superfund/Technical Reports

April 24, 1987

Stephen W. Holt
Senior Environmental Engineer
Environmental Control Department
NL Industries, Inc.
P.O. Box 1090
Highstown, New Jersey 08520

RECEIVED
APR 27 1987
U.S. EPA REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE EMERGENCY RESPONSE

Dear Mr. Holt:

The purpose of writing is to discuss two matters: 1) data reporting and 2) groundwater analyses for quarter two.

In accordance with QAPP comments dated July 24, 1985 (attached) and Data Assessment Procedures, p. C-6 of the QAPP, NL Industries must submit data packages to the IEPA for all analyses completed. This includes quarter one samples which have already been analyzed and quarter two samples which are awaiting analysis. Data packages must follow CLP requirements and must include:

1. Cover sheet, listing the samples included in the report and narrative comments describing problems encountered in analysis.
2. Tabulated results of inorganic compounds identified and quantified.
3. Analytical results for QC sample spikes, sample duplicates, initial and continuous calibration verification of standards and blanks, standards procedural blanks, laboratory control samples and ICP interference check samples.
4. Tabulation of instrument detection limits determined in the pure water.
5. Raw data system printout (or legible photocopies) identifying date of analyses, analyst, parameters determined, calibration curve, calibration verifications, method blanks, sample and any dilutions, sample duplicates, spikes and control samples.

Concerning groundwater analysis parameters for quarter two, the IEPA has determined that the list of parameters used for quarter one excluding antimony (Sb) should be used. It is our contention that at least two quarters of sampling which show insignificant concentrations of constituents of an existing waste source are necessary to demonstrate that the constituents are of no concern. If a constituent is not present in the waste then one sampling showing insignificant concentrations is likely adequate.



Page 2

The standards used by IEPA to evaluate significance are the federal maximum contaminant levels established by the Safe Drinking Water Act and the Illinois General Use Water Quality Standards and Public and Food Processing Water Supply Standards from the State of Illinois Rules and Regulations, Title 35, Subtitle C, Chapter I, whichever is the most stringent. Parameters were determined to be insignificant if their concentrations (or their detection limits if concentrations are below the detection limit) are less than half of the most stringent standard.

Concentrations of the following parameters are insignificant based on quarter one data: Sb, Cr, Hg, Se, Ag.

Data from previous sampling of the waste and monitoring wells has been reviewed to determine whether groundwater has been tested for constituents found in the waste. Waste has been sampled and found to contain Cr, Hg, Se, and Ag. In 1983 monitoring wells were sampled and analytes included Cr and Ag but not Hg and Se. Cr and Ag were found in significant concentrations. Therefore, only antimony (Sb) may be deleted from quarter two sampling and all other analytes from quarter one sampling must be used.

Should you require additional information please contact me.

Sincerely,

Kenneth M. Miller
Federal Site Management Unit
Remedial Project Management Section
Division of Land Pollution Control

KMM:sf/2306g,32-33

cc: Janice Perino
Terry Ayers
Bina Fleck
DLPC File
Author
Brad Bradley - USEPA